

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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Civ. Case No. 05-8501((KMK)(JCF)  
JODY CONCEPCION,

Plaintiff

ECF Case

-against-

THE CITY OF NEW YORK, POLICE OFFICER  
ALEXIS FERNANDEZ, "JANE and JOHN DOES" 1-15,  
and the REPUBLICAN NATIONAL COMMITTEE,

Defendants  
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**DECLARATION OF KAREN WOHLFORTH IN SUPPORT OF PLAINTIFF'S  
MOTION TO COMPEL PRODUCTION OF DOCUMENTS UNDER FRCP  
RULES 37, 34, AND 26 and LOCAL CIVIL RULE 33**

KAREN WOHLFORTH, having been fully apprised of the penalties of perjury, declares and states that the following statements made of her own knowledge are true and that statements made on information and belief, and opinions, she believes to be true:

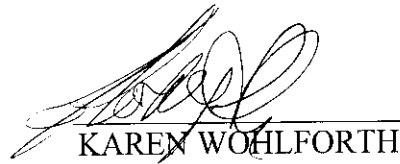
1. I am one of the attorneys representing the Plaintiff in this action.
2. I submit this Declaration in support of Plaintiff's Motion to Compel Production of Documents and for Sanctions pursuant to Rule 37 (4).
3. Attached as Exhibit A is a true and correct copy of the Defendants' Rule 26(a) Disclosures submitted by former attorney for defendant Republican National Committee, Jeffrey T. Buley, dated December 2, 2005..
4. Attached as Exhibit B is a true and correct copy of the Defendant's Amended Rule 26(a) Disclosures submitted by Corporation Counsel for defendants City of New York, Alexis Fernandez and the Republican National Committee, by their attorney Michael A. Cardozo, Corporation Counsel for the City of New York, dated December 6, 2005..

5. Attached as Exhibit C is a true and correct copy of the Plaintiff's First Set of Interrogatory and Documentary Demands dated December 21, 2005.

6 Attached as Exhibit D is a true and correct copy of the Defendants' Responses and Objections to Plaintiff's Preliminary Requests for Production of Documents, dated December 30, 2005.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

New York, New York  
March 22, 2006



KAREN WOHLFORTH